

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States Courts
Southern District of Texas
FILED

July 16, 2024

United States of America

v.

Nathan Ochsner, Clerk of Court

Case No. M-24-1171-M

Homero AGUILAR Jr.

YOB: 2005

COC: United States of America

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

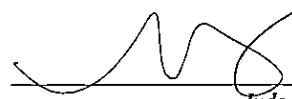
On or about the date(s) of July 15, 2024 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*8 U.S.C. 1324(a)(1)(A)(ii) &
8 U.S.C. 1324(a)(1)(A)(v)Knowingly transport or move or attempt to transport or move aliens
from a location in Hidalgo, Texas to another location in Hidalgo, TX by
foot.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved by AUSA A. McColgan

/s/ Juan R. Cienega*Complainant's signature*Juan R. Cienega*Printed name and title*☐ Sworn to telephonically and signed electronically
per Fed.R.Cr.4.1Date: July 16, 2024 8:26 a.m.City and state: McAllen, Texas*Judge's signature*Nadia Medrano, U.S. Magistrate Judge*Printed name and title*

ATTACHMENT A

The defendant, a United States citizen, attempted to illegally smuggle into the United States two minor aliens, a 15-year-old female and a 3-year-old male, through the Hidalgo Port of Entry. Both minor aliens were confirmed to be Mexican citizens. The defendant claimed the two minors were United States citizens. At pedestrian primary, the defendant presented a recently issued City of Weslaco, Texas birth certificate bearing the name A.D.J.A for the female, and a recently issued City of Weslaco, Texas birth certificate bearing the name B.A.C. for the male. Both children were referred to secondary for further inspection due to recently issued birth certificates and lack of crossing history for both minors.

In secondary, the defendant was adamant the female was his sister and claimed the male as his nephew. Further inspection of the female's identity revealed her true identity as J.A.A.M. and place of birth as Tampico, Tamaulipas, Mexico. J.A.A.M. stated the minor male was her brother and provided his true identity as D.G.G.M. and his place of birth as Ciudad Madero, Tamaulipas, Mexico. Customs and Border Protection Officers searched the minors' belongings and located Mexican birth certificates for both J.A.A.M. and D.G.G.M. Additionally, the female stated the defendant was her boyfriend. Database queries on both children yielded negative results to any legal status in the United States.

When confronted with the female's statements, the defendant admitted to using his sister's and nephew's City of Weslaco, Texas birth certificates to facilitate the illegal entry of both minors. The defendant intended to transport the minors to the defendant's residence in Donna, Texas.